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6 **UNITED STATES DISTRICT COURT**  
7 **DISTRICT OF NEVADA**

8 UNITED STATES OF AMERICA,

9 Plaintiff,

10 vs.

11 LINDSEY FAY SARAC,

12 Defendant.

Case No. 2:18-cr-00036-RFB-PAL

**Preliminary Order of Forfeiture**

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14 This Court finds that Defendant Lindsey Fay Sarac pled guilty to Counts One,  
15 Two, and Four of a Four-Count Criminal Indictment charging her in Count One with  
16 Possession with Intent to Use 5 or More Identification Documents in violation of  
17 Title 18, United States Code, Section 1028(a)(3); in Count Two with Possession of 15  
18 or More Counterfeit or Unauthorized Access Devices in violation of Title 18, United  
19 States Code, Section 1029(a)(3); and in Count Four with Aggravated Identity Theft  
20 in violation of Title 18, United States Code, Section 1028A(a)(1) with 1028A(c)(4).  
21 Criminal Indictment, ECF No. 14; Change of Plea, ECF No. \_\_; Plea Agreement, ECF  
22 No. \_\_.

1        This Court finds that Defendant Lindsey Fay Sarac agreed to the forfeiture of  
2 the property set forth in the Plea Agreement and the Forfeiture Allegation of the  
3 Criminal Indictment. Criminal Indictment, ECF No. 14; Change of Plea, ECF No.  
4 \_\_; Plea Agreement, ECF No. \_\_.

5        This Court finds, pursuant to Fed. R. Crim. P. 32.2(b)(1) and (2), the United  
6 States of America has shown the requisite nexus between property set forth in the  
7 Plea Agreement and the Forfeiture Allegation of the Criminal Indictment and the  
8 offenses to which Defendant Lindsey Fay Sarac pled guilty.

9        The following property is (1) any property, real or personal, which constitutes  
10 or is derived from proceeds traceable to violations of Title 18, United States Code,  
11 Sections 1028(a)(3), 1028A(a)(1) with 1028A(c)(4), and 1029(a)(3), or a conspiracy to  
12 commit such offenses; (2) any property constituting, or derived from, proceeds  
13 obtained directly or indirectly, as the result of violations of Title 18, United States  
14 Code, Sections 1028(a)(3), 1028A(a)(1) with 1028A(c)(4), and 1029(a)(3), or a  
15 conspiracy to violate such offenses; (3) any personal property used or intended to be  
16 used to commit violations of Title 18, United States Code, Section 1028(a)(3); and (4)  
17 any personal property used or intended to be used to commit violations of Title 18,  
18 United States Code, Sections 1029(a)(3) and 1028A(a)(1) with 1028A(c)(4), and is  
19 subject to forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C)  
20 with Title 28, United States Code, Section 2461(c); Title 18, United States Code,  
21 Section 982(a)(2)(B); Title 18, United States Code, Section 1028(b)(5), (g), and (h);  
22 Title 18, United States Code, Section 1029(c)(1)(C) and (c)(2); and Title 21, United  
23 States Code, Section 853(p):

i. any and all fraudulent identification documents including, but not limited to at least:

a) any and all social security cards including, but not limited to at least the following cards (identified by initials of the card holder and last four digits of the social security number):

A.M. / 9592	D.C. / 7862	E.B. / 1882	F.S. / 6021	I.E. / 7982
J.J. / 3837	J.M. / 8407	L.J. / 7562	L.M. / 9702	N.K. / 1232
R.P. / 6703	S.B. / 2298	T.M. / 9775	X.B. / 7924	

b) any and all driver's licenses or identification cards including, but not limited to at least:

1. Nevada driver's licenses and identification cards in the names of A.T., C.B., C.J., C.O., C.V., D.F., D.M., E.K., E.V., G.P., G.W., I.C., J.B., K.H., K.K., L.M., L.S., M.D., M.P., M.S., N.M., R.D., R.P., R.S., S.M., and T.W.;
2. California driver's licenses and identification cards in the names of C.B., M.P., O.C., S.S.;
3. Nevada Medicaid cards in the name of A.M., B.J., D.C., J.D., J.J., K.J., L.J., R.P., R.V., and S.B.;
4. Hong Kong identification card in the name of N.N.; and
5. United States passports in the names of J.F. and L.D.

ii. any and all fraudulent access devices including, but not limited to at least:

a) any and all counterfeit or unauthorized credit or debit cards including, but not limited to at least the following cards (identified

by the initials of the card holder and the last four digits of the card number):

A.M. / 0363	A.M. / 8674	A.P. / 0256	B.K. / 3702	B.L. / 1602
B.L. / 9477	B.M. / 3069	B.M. / 6451	B.T / 7924	B.T. / 5006
C.B. / 1151	C.B. / 1729	C.B. / 2580	C.B. / 6422	C.B. / 6961
C.B. / 9590	C.B. / 9863	C.J. / 9193	C.M. / 2878	C.M. / 4800
C.O. / 4898	C.P. / 0594	D.M. / 4051	D.M. / 4555	D.M. / 5678
D.M. / 5876	D.M. / 8840	D.M. 6949	D.P. / 0637	D.P. / 7995
D.P. / 9170	D.R. / 3813	E.D. / 9338	E.S. / 7694	F.S. / 7405
F.T. / 2395	G.C. / 4102	G.C. / 7575	G.M. / 1312	G.P. / 0594
I.C. / 0303	I.S. / 4652	I.V. / 1395	J.B. / 0231	J.B. / 0792
J.B. / 1015	J.B. / 3332	J.B. / 4384	J.B. / 7479	J.L. / 6458
J.O. / 7783	K.B. / 0710	K.R. / 5338	K.V. / 0319	K.V. / 1728
L. M. / 8901	L.B. / 6458	L.J. / 7194	L.K. / 8367	L.M. / 0692
L.M. / 0721	L.M. / 1448	L.M. / 3024	L.M. / 3691	L.M. / 5710
L.M. / 6642	L.M. / 7836	L.S. / 1089	L.S. / 2276	L.S. / 7179
L.S. / 7425	L.S. / 8238	L.S. / 8818	L.S. / 9390	L.S. / 9665
M.A. / 8573	M.B. / 1720	M.M. / 8890	M.M. / 9849	M.N. / 3183
M.S. / 7787	N.A. / 3810	N.N. / 1003	P.D. / 5729	P.P. / 2286
R.A. / 6253	R.P. / 8506	R.P. / 9809	R.Q. / 6064	R.T. / 6734
S.A. / 4570	S.A. / 5749	S.H. / 4255	S.M. / 0626	S.V. / 5238
S.W. / 4646	T.D. / 1111	T.D. / 5959	T.F. / 5461	T.H. / 2038
T.H. / 2038	T.H. / 8050	V.D. / 9500	V.E. / 6084	V.R. / 0085
W.L. / 7736				

b) any and all notebooks, checks, account statements, and other papers containing credit or debit card numbers;

c) any and all notebooks, checks, account statements, and other papers containing bank account numbers; and

iii. any and all stolen mail

(all of which constitutes property).

This Court finds the United States of America is now entitled to, and should, reduce the aforementioned property to the possession of the United States of America.

1       NOW THEREFORE, IT IS HEREBY ORDERED, ADJUDGED, AND  
2 DECREED that the United States of America should seize the aforementioned  
3 property.

4       IT IS FURTHER ORDERED, ADJUDGED, AND DECREED all possessory  
5 rights, ownership rights, and all rights, titles, and interests of Lindsey Fay Sarac in  
6 the aforementioned property is forfeited and is vested in the United States of  
7 America and shall be safely held by the United States of America until further order  
8 of the Court.

9       IT IS FURTHER ORDERED, ADJUDGED, AND DECREED the United  
10 States of America shall publish for at least thirty (30) consecutive days on the official  
11 internet government forfeiture website, [www.forfeiture.gov](http://www.forfeiture.gov), notice of this Order,  
12 which shall describe the forfeited property, state the time under the applicable  
13 statute when a petition contesting the forfeiture must be filed, and state the name  
14 and contact information for the government attorney to be served with the petition,  
15 pursuant to Fed. R. Crim. P. 32.2(b)(6) and Title 21, United States Code, Section  
16 853(n)(2).

17       IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that any  
18 individual or entity who claims an interest in the aforementioned property must file  
19 a petition for a hearing to adjudicate the validity of the petitioner's alleged interest  
20 in the property, which petition shall be signed by the petitioner under penalty of  
21 perjury pursuant to Title 21, United States Code, Section 853(n)(3) and Title 28,  
22 United States Code, Section 1746, and shall set forth the nature and extent of the  
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1 petitioner's right, title, or interest in the forfeited property and any additional facts  
2 supporting the petitioner's petition and the relief sought.

3 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED a petition, if any,  
4 must be filed with the Clerk of the Court, 333 Las Vegas Boulevard South, Las  
5 Vegas, Nevada 89101, no later than thirty (30) days after the notice is sent or, if  
6 direct notice was not sent, no later than sixty (60) days after the first day of the  
7 publication on the official internet government forfeiture site, [www.forfeiture.gov](http://www.forfeiture.gov).

8 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED a copy of the  
9 petition, if any, shall be served upon the Asset Forfeiture Attorney of the United  
10 States Attorney's Office at the following address at the time of filing:

11 Michael A. Humphreys  
Assistant United States Attorney  
12 Daniel D. Hollingsworth  
Assistant United States Attorney  
13 501 Las Vegas Boulevard South, Suite 1100  
Las Vegas, Nevada 89101.  
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15 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED the notice  
16 described herein need not be published in the event a Declaration of Forfeiture is  
17 issued by the appropriate agency following publication of notice of seizure and intent  
18 to administratively forfeit the above-described property.

19 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that the Clerk  
20 send copies of this Order to all counsel of record.

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1 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that the Clerk  
2 send copies of this Order to all counsel of record and three certified copies to the  
3 United States Attorney's Office, Attention Asset Forfeiture Unit.

4 DATED this 17<sup>th</sup> day of May, 2018.

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7 HONORABLE RICHARD F. BOULWARE, II  
8 UNITED STATES DISTRICT JUDGE  
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